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Agency Secretary

California Regional Water Quality Control Board
North Coast Region
Beverly Wasson, Chairperson

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Arnold
Schwarzenegger
Governor

March 25, 2005

Ms. Julie B. Raming
Georgia-Pacific Corporation
P.O. Box 105605
Atlanta, GA 30348-5605

Dear Ms. Raming:

Subject: Site Assessment Comments

File: Georgia-Pacific Fort Bragg Sawmill, 90 West Redwood Avenue, Fort Bragg
Case No. 1NMC462

Enclosed with this letter is the remainder of my comments on the Phase I and Phase II environmental site assessments performed on the Georgia-Pacific Fort Bragg sawmill site and subsequent assessments. I previously provided comments on these matters in an August 12, 2004 letter and in a November 17, 2004 letter. I have generally not duplicated those comments in the enclosure. We have already discussed many of the comments in this enclosure in meetings on January 27, 2005 and March 10, 2005. Please submit a response to these comments within two months of the date of this letter. I understand your consultant Acton Mickelson Environmental, Inc. is already preparing a workplan for further investigation to address many of these comments.

As we have discussed, we anticipate that human health and ecological risk assessments will need to be performed for this site. In addition to review by Regional Water Quality Control Board staff, these assessments will receive review by staff at the Office of Environmental Health Hazard Assessment (a separate division within the California Environmental Protection Agency).

If you have any questions or comments, you may contact me at chunt@waterboards.ca.gov or (707) 570-3767.

Sincerely,

/ORIGINAL SIGNED BY/
Craig Hunt
Water Resource Control Engineer

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Enclosure: Comments on Parcels ____

California Environmental Protection Agency

(w/encl.) ____

cc: Barbara J. Mickelson, Acton Mickelson Environmental, Inc., 5175 Hillsdale Circle,
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Mr. Doug Heitmeyer, Georgia-Pacific Corporation, 90 West Redwood Avenue, Fort
Bragg, CA 95437

Mendocino County Environmental Health Department, 501 Low Gap Road, Room 1326,
Ukiah, CA 95482

Ms. Linda Ruffing, Community Development Department, City of Fort Bragg, 416 N.
Franklin Street, Fort Bragg, CA 95437

Mr. Dave Goble, Public Works Department, 416 N. Franklin Street, Fort Bragg, CA
95437

Mr. Andy Whiteman, City Manager, 416 N. Franklin Street, Fort Bragg, CA 95437

Ms. Loie Rosenkrantz, 17201 Franklin Road, Fort Bragg, CA 95437

Mr. David L. Berry, Department of Toxic Substances Control, P.O. Box 806,
Sacramento, CA 95812

Ms. Ashle Crocker, Remy, Thomas, Moose, and Manley, 455 Capitol Mall, Suite 210,
Sacramento, CA 95814

Email cc List



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Phase I and Phase II Environmental Site Assessment Report Comments

These are the remainder of our comments on the *Phase I and Phase II Environmental Site Assessments Reports* and subsequent assessments for the Georgia-Pacific Fort Bragg Sawmill site. General site comments are presented first, followed by area specific comments, and then public comments related to potential site soil and groundwater contamination not previously presented in our August 12, 2004 comment letter. Some public comments that confirmed items already in Regional Water Quality Control Board files are not included.

GENERAL COMMENTS

Although the general scope of the site was discussed in the assessments performed and figures contained in the assessments have outlined the site, a rigorous description of what real properties constitute the site has not been included. A more detailed description of what real properties were included in the assessments, including Assessor Parcel Numbers, should be submitted. Any other properties owned by Georgia-Pacific Corporation in the vicinity of the mill should also be noted.

Since the work done to prepare the Phase I report, there have been some operational changes at the plant. It came to our attention that one of these operations included treating lumber using a dip-tank inside one of the buildings. A description of all operations at the site since the Phase I report was prepared and that were not included in the Phase I report should be submitted. These descriptions should include information on the chemicals used and the locations of the use and storage of the chemicals.

It has been proposed that soils under some building foundations be remediated or addressed when the foundations are removed as part of demolition activities. I had informed you that a detailed workplan would need to be submitted for approval describing how soils would be screened for proper treatment, disposal, or reuse. We received a workplan regarding this work March 23, 2005. That workplan has not yet been reviewed.

Soil samples from many areas of the site were impacted with varying concentrations of heavier petroleum hydrocarbons. The risks posed by these impacts needs to be systematically addressed.

In the Phase II report, generally no impacts were noted regarding concentrations of metals detected. I do not concur that there have not been impacts. A systematic approach needs to be taken to determine which detections represent local background concentrations and which represent impacts. After that is completed, an evaluation will then need to be made to address what risks are posed by those impacts.

California Environmental Protection Agency

Recycled Paper

The investigation reports submitted thus far have not included figures of contaminant levels. Your response to these comments should include figures showing contaminant levels detected in soil and groundwater. The results of the different stages of investigation should be consolidated on the same figures. These figures should include enlargements of areas of interest. At our March 10, 2005 meeting, you presented to me paper copies of new draft figures incorporating some of these comments. The new figure format is very useful. Final versions of these figures, including the electronic format presented (allowing for zooming in on the figures), should be included in your response.

I have previously requested that all water, soil, and vapor lab data, monitoring well survey, elevation, and depth to water data, and a site map be sent to the State Water Resources Control Board GeoTracker database. To date, a map, survey data, and the depth to water data from the first and second quarter 2004 monitoring events have been submitted. No analytical data has been submitted. This data still needs to be submitted. Also, the GeoTracker regulations have recently been revised. Future investigation reports and bore hole logs will need to be submitted to the GeoTracker system. The regulations also address shifting reporting requirements for contamination investigation sites away from the submittal of paper reports. Unless and until this office otherwise directs you, reports for this case still need to be submitted to this office in paper form and on CD in addition to the GeoTracker electronic submittal requirements.

Appendix F of the Phase II report was a copy of the text of a 1998 report by TRC of investigation results. The investigation included soil sampling from in and around structures to be demolished. These included Planing Mill No. 1, Planing Mill No. 50, and the sawmill including the green chain. However, not all the results were included in this copy of the report. Please submit a full copy of the report. The report also contained recommendations for additional investigation in the following areas:

- " - Former dip tank in Planing Mill No. 1
- Eastern portion of Sawmill
- Western exterior of Sawmill (i.e., near Boring SM-12)
- Soils beneath Green Chain structure
- Areas in the vicinity of former equipment footings in Planing Mill No. 1."

These recommendations do not all appear to have been acted upon in the Phase II investigation work. These recommendations should be followed up on in the next phase of work. In addition, please elaborate on the former dip tank in Planing Mill No. 1.

Photos of a facility map (the map was reportedly from 1962) were provided to me. The map shows the locations of at least some of the underground water pipes on the site. Some of the pipes are listed as transite pipe. I include other items of potential interest from this map through the rest of my comments.

The VOCs listed in the Phase II report tables did not include all the VOCs that were detected in the analytical reports. VOCs not listed in the tables that were detected in some samples included benzene, toluene, ethylbenzene, propylbenzene, and chlorobenzene. There were also some minor discrepancies between the SVOC analytical results from the laboratory reports and the Phase II report tables

Dichloromethane and acetone were reported in the VOC analytical results for various samples. In some discussions regarding these detections, it has been suggested that these could be lab artifacts rather than actual detections. This needs to be clarified.

In the Additional Assessment Report, analytical results for a clinker ash sample from Parcel 10 were included in an appendix. However, no discussion of the results were included in the report. The analytical method used for polynuclear aromatic hydrocarbons (PAHs) was a more sensitive method than previously used at the site. There were multiple detections for PAHs. Please conduct an evaluation of these results.

In the laboratory reports with the Phase II report, there were results and a chain-of-custody listing for a soil sample labeled SS-1 and a water sample labeled CS-1. The date of the sampling was April 2, 2003 and the laboratory report number was 164563. Those samples had TPH-d, TPH-g, VOC, and SVOC detections. I did not find other references to these samples. Where were those samples collected?

The use of wood treatment chemicals in the last few years of facility operation was not addressed. A spray operation inside one of the buildings used a propiconazole wood treatment chemical. This operation needs to be evaluated for potential impacts.

The disposal or long-term disposition of any remaining ash and clinker piles needs to be addressed.

PARCEL 2

I do not agree that one of the soil samples had metals concentrations representative of those found in the greater area. Specifically, the sample P2-4@2' had concentrations of lead, zinc, and mercury that appear to be above background concentrations.

It was stated that the groundwater sample from P2-6 did not indicate the groundwater was impacted by TPH-d. That groundwater sample did have, however, a TPH-d detection of 92 µg/L with a laboratory notation that the detection was due to a heavier product.

The TPH detected in the P2-2 groundwater sample needs to be further investigated.

It was recommended that soil excavation be performed in the areas of P2-3 and P2-6. Removal in the area of P2-4 may also be needed. Overall, before building foundations are removed, a workplan will need to be submitted for approval outlining how soils under buildings will be screened for contamination.

Is there any additional information on the composition the glues used in the glue lam building? The potential for those glues to have impacted soil and groundwater should be evaluated.

Due to the heavier TPH detections and the glue use, SVOCs should be included with the analyses of the monitoring well groundwater samples.

In the three monitoring events of the monitoring wells, the groundwater gradient indicated by the three Parcel 2 monitoring wells has been west-northwest. A monitoring well should be placed in a more downgradient direction of the glue lam area. Another monitoring well should be placed in the immediate area of P2-11.

PARCEL 3

It appears that in the Phase II report figures and subsequent figures, Former Planer No. 1 and Planer No. 50 are mislabeled as Former Planer No. 50 and Planer No. 5, respectively. My comments are based on the Phase II text and the Phase I figures as being correct and the Phase II figures as being incorrect.

Pothole P3-TP1 was reported in the Phase II report tables and boring logs; however, I have not located it on the maps. Where was this pothole?

RAILROAD SPURS

All the soil samples taken from this area for laboratory analysis were from 6 inches below the surface and no groundwater samples were taken. Further investigation in this area is needed to evaluate for the potential for deeper impacts and impacts to groundwater. This is in addition to the recommended additional investigation for the petroleum impact in the P3-12 area.

PLANER NO. 50

The results from the 1998 soil investigation in this area need to be submitted to this office.

The 1960's facility map shows transformers located between the Planar No. 5 building and the Planar No. 1 building. That location should be investigated for PCB impacts.

PLANER NO. 1

The reported TPH concentrations from the 1998 investigation were higher for the southern half of this building than were the TPH concentrations detected in the two Phase II borings performed at the southeast corner of the building (P3-20, P3-21). The groundwater in and downgradient of the more heavily impacted areas needs to be investigated.

DRY SHEDS NO. 4 AND 5

The SVOC chemical analysis used did not include tetrachlorophenol as an analyte. Tetrachlorophenol was the chlorophenol ingredient in one treatment chemical allegedly used at the site. In addition, the reporting limit for pentachlorophenol in the analysis used was 19 µg/L in water. The California Office of Environmental Health Hazard Assessment's Public Health Goal for pentachlorophenol in drinking water is 0.4 µg/L. Groundwater in and downgradient of areas of potential wood treatment chemical use should be tested for pentachlorophenol and tetrachlorophenol using an analytical method with greater sensitivity for these analytes. Possible

areas of wood treatment chemical application include the former dip tank location, the green chain area, and lumber storage and loading areas in Parcel 3.

The 1960's facility map shows a building labeled "Lumber Treating" located in the approximate area of borings P3-56 and P3-57, which were put in a location alleged to have had a dip tank.

FORMER MOBILE EQUIPMENT SHOP

PAHs were not tested for in this area except for the more recent groundwater samples from the monitoring wells. Soils impacted with TPH should be tested for PAHs.

MTBE was detected in the soil samples from P3-35 and in groundwater samples from P3-35 and MW-3.1. The extent of the MTBE contamination should be determined. This includes investigating in the upgradient direction.

Chlorinated VOCs were detected in multiple groundwater samples from this area, including the three monitoring wells. The extent of the chlorinated VOC contamination should be determined. This includes investigating in the upgradient direction.

The water sample from P3-28 appeared to be impacted with a lighter petroleum product, like gasoline, in addition to the heavier petroleum products detected in this area. The extent of that contamination should be investigated.

CONSTRUCTION ENGINEERING

In the Phase I report, a paint storage shed was identified west of the main building. The area of the shed should be evaluated.

KILNS AREA

I have no comment for this area except for the general comments for the site.

COMPRESSOR HOUSE

The extent of the contamination found in this area needs to be investigated.

In the Phase II report, excavation of soil around P3-47 to a minimum depth of one foot was recommended. Any remedial action in this area will need to go deeper since the four foot sample from P3-47 was more heavily impacted than the 0.5 foot sample.

MACHINE SHOP / SHEET METAL / PLUMBING / PLANT SUPPLY

I concur with the recommendation to excavate soils when the foundations are removed. Soils around the buildings, including behind the buildings, will also need to be addressed.

COVERED SHED

I concur with the Phase II recommendation that further investigation is needed in this area. However, this includes impacts with metals that were not mentioned in the report text. In soil sample P3-54@1', the lead, copper, cadmium, and zinc concentrations appear to be one to two orders of magnitude greater than the concentrations more typically encountered across the site.

OVERHEAD TRANSFORMERS

No comment.

PARCEL 4

According to a Regional Water Board staff inspection memo from 1986, there was a Cat fueling area by the hog fuel pile. In that area there was oily material on the dirt. The approximately 500-gallon AST had no berms. There was an oily sheen from there to the pump station in the discharge culvert. In a follow-up letter from GP, it was stated that the diesel AST by the powerhouse was removed and a mobile fuel truck would be used. Potential impacts in this area need to be investigated.

The fuel AST lines should be dug up and the soil inspected for impacts.

The two cooling tower borings were performed to the east and west of the cooling towers. Sampling should be done directly beneath the cooling towers building.

The Phase II report contained recommendations to investigate geophysical survey anomalies in Parcel 4. These do not appear to have been investigated with the additional assessment work.

PONDS

The full depth of the sediments of the ponds west of the powerhouse should be investigated.

From our files, there was another pond in between the fuel house and Pond 6. That filled pond should be investigated.

FORMER BUNKER FUEL ASTS

In 1992, a soil and groundwater investigation in the area of the bunker C tank farm area (now the former bunker fuel ASTs area). Soil and groundwater was found to be impacted with petroleum product. I did not find in our files a report of any remedial action in this area. The petroleum impact to this area needs to be addressed.

POWER HOUSE FUEL STORAGE

I have no comment on this area except for the general comment and the comment above regarding the fuel lines.

POWER HOUSE

Some impacts of petroleum and metals were found with the additional investigation performed in July 2004. The extent of these impacts needs to be determined. Additionally, investigation should extend deeper under the powerhouse. Additional investigation of soils under the powerhouse could be completed after the removal of the powerhouse foundation, as recommended in the Phase II report.

Boring logs for the borings done in the Power House area in July 2004 were not included with the Additional Site Assessment Report.

In the Phase I report, the paint shed south of the powerhouse was identified as needing investigation. That investigation does not appear to have been performed. That investigation should be performed

PRESS BUILDING

From the laboratory reports, the deeper (3') soil sample from boring P4-21 was analyzed for TPH-d outside of the maximum sample hold time for the method.

The extent of the contamination found in this area should be investigated. In addition, the soils under the building foundation should be evaluated for impacts when the foundation is removed.

OIL STORAGE SHED

Surface soil in this area was found to be impacted with petroleum product. However, no samples deeper than six inches were collected. The extent of the contamination in this area needs to be determined. This should include investigation directly beneath the shed.

TRANSFORMERS

No comment.

PARCEL 5

According to Regional Water Board staff inspection memos and correspondence from 1987 in our files, there was an open pit that received some truck wash wastewaters. Regional Water Board staff noted that pit soils appeared to be impacted with oil. One boring was completed to 8' at this location. Heavy petroleum impacts were not indicated, but Regional Water Board staff did note that at 8' the bottom of the pit wastes had not been reached. Although the location of the pit is not noted on any maps in our files, from photographs and notes in our files it appears that this pit was located southwest of the more current fuel storage and dispensing structure (noted as area 5.11 in the Phase I report). The pit appears to have since been filled in. There was also an AST next to this pit. On one map in our files, this area was identified as having a diesel storage tank.

A separator associated with the pit may have been the oil trap identified southwest of the fuel storage structure in Figure 6.2 of the Phase I report. This area needs additional evaluation.

The facility map from the 1960's identifies the building west of the mobile equipment shop as record storage and general storage. This seems to be the structure noted in the Phase I report in older aerial photographs of the site that was subsequently replaced with the tire shop building. Also on the map a 1000-gallon buried diesel tank is shown just north of the northwest corner of this building. This may or may not correspond with the potential UST identified in the geophysical survey performed west of the mobile equipment shop. The UST identified on the 1960's map may have been west of the geophysical survey. In addition, a buried waste diesel tank is shown on the 1960's map north of the northwest corner of the mobile equipment shop. This location may have been outside the limits of the geophysical survey area. Both of these locations should be further evaluated.

The Sanborn maps provided in the Phase I report show an open refuse fire location south of Sawmill No. 1. This area should be investigated.

From historic maps of the site, there have been operations south of the east end of Sawmill No. 1. Identifications on the maps include "No 5 Shingle Mill" and "Eng Ho". This area should be evaluated.

It should be noted that some of the soil samples analyzed for TPH and VOCs were analyzed outside the hold time for the analyses. These samples were the second soil samples taken from borings P5-2@5', P5-22@5', P5-24@5', P5-25@5', and P5-26@5'.

SAWMILL NO. 1

I concur with the Phase II recommendation to excavate soils in this area when the foundation is removed. In addition, the extent of the contamination found should be investigated.

LOG POND

Through the history of this facility, the log pond has had the potential to receive discharges and wastes from various operations. The sediments of the log pond need to be investigated. This investigation needs to extend through the full depth of sediments and fill.

AREA WEST OF MOBILE EQUIPMENT SHOP, MOBILE EQUIPMENT SHOP, WASHDOWN BUILDING, FUEL STORAGE AND DISPENSER BUILDING, TIRE SHOP, LOG POND FILL MATERIAL AREA

A significant amount of petroleum contamination has been found in this general area. The extent of this contamination needs to be investigated, both laterally and vertically. This includes not only looking in the generally downgradient direction but also investigating the source areas more in other directions.

Low levels of chlorinated solvents have also been detected in this area. Chlorinated solvents should be included with the further investigation. In addition, the chlorinated solvent PCE has

been detected in groundwater samples from the gas station area in Parcel 5. While the gas station is the subject of a separate Regional Water Board case, the PCE detected may be contributing to the chlorinated solvent detections in the shop area. Although a different responsible party is performing that investigation, the gas station is on Georgia-Pacific property. You should have groundwater samples from these monitoring wells analyzed for chlorinated solvents. Also, the potential for the chlorinated solvents to be coming from off-site should be evaluated.

The fuel lines in these areas should be dug up and the soil examined for impacts.

Future investigation in the log pond fill material area should also extend down to native material. It does not appear from the boring and pothole logs that the investigation performed so far has reached native material under the fill.

TRANSFORMER PAD

A detection of 0.035 mg/kg PCBs was detected in one of the three surface soil samples taken in this area. This area should be investigated further, including vertically, for PCBs.

FORMER BOARDING HOUSE AREA

According to the Phase I report, this area was investigated due to an oil house shown to the west of the boarding house on the Sanborn maps. Comparing features on both the Sanborn maps and in the Phase II investigation map for this location, it appears that the two borings performed for this area, P5-43 and P5-44, may have been south of the oil house location. This should be further evaluated.

PARCEL 6

The facility map from the 1960's shows a gas pump and buried gasoline storage tank to the east of the veneer plant. The veneer plant was the northern section of the more current planer no.2 building. From the old aerial photographs in the September 9, 2004 TRC *Response to Comments*, it appears that the location of the gas pump on the 1960's facility map was in the area of the northeast corner of the planer no. 2 building.

The 1960's facility map shows a truck shop located in what appears to be the southern side of Parcel 6. This building can also be seen in the 1963, 1966, 1973, and 1982 aerial photographs provided in the TRC Response to Comments report. The location does not coincide with the investigation that was performed around the shipping office (an undated map in our files does identify the shipping office location as a truck shop). This additional truck shop location needs to be investigated.

The area in which the shipping office is shown in the Phase I report had in the 1960's facility map building labeled as "No 8 Fiber Plant", "Warehouse", and "Bark Shelter". These structures coincide with structures in the old aerial photographs of the site. The 1960's facility map also shows an oil house to the west of the northwest corner of the fiber plant. The oil house area should be investigated.

HAZARDOUS WASTE STORAGE AREA

The PCB detection in soil sample P6-1@0.5' indicates a PCB impact in that area. The extent of the impact should be investigated.

A petroleum impact to soil was found with the two borings performed in this area. The extent of the impact should be investigated. It should be noted that the soil sample P6-2@3' was analyzed out of the normal hold time for the TPH analysis.

A pothole was completed outside the building in this area (P6-PH3). The extent of the TPH impact in this area should be investigated.

PLANER MILL NO. 2

TPH-d in groundwater was detected up to 330 µg/L in this area, which is above the water quality objective of 100 µg/L. Further evaluation of the contamination in this area is needed.

The 1960's facility map shows a compressor house adjacent to the north side of the veneer plant (planer no. 2 building). That area should be evaluated.

It was stated in the Phase I report that this mill was operated as a plywood plant at one time. An evaluation of that use should be made on what potential impacts it could have had on soil and groundwater.

SHIPPING OFFICE

The extent of the petroleum contamination in soil and groundwater in this area should be investigated. This includes the shipping office area covered by boring P6-14, which was grouped with P6-15 in the Phase II report but which was located next to the shipping office and not near P6-15.

The Phase II report contained a recommendation to investigate a geophysical survey anomaly in this area. That should be done.

FILL AREA

In the Phase I report, it was stated that the 1973 aerial photograph showed the log pond as it currently existed. That is not accurate. The southwest end of the pond was filled in since the 1982 aerial photograph was taken. A 1/29/1996 Regional Water Board staff inspection memo indicates that part of the pond was filled in around that time.

The installation of one monitoring well in this area was recommended in the Phase II report. I recommend the installation of at least three monitoring wells in this area due to the size of the area and the uncertainty of the variability of materials in the fill. I also recommend that the entire fill area be geophysically surveyed to better characterize the fill.

PARCEL 7

Soil samples P7-5@0.5' and P7-11@0.5' were analyzed for TPH-d both with and without silica gel cleanup. The silica gel cleanup results for these two samples were misreported in the Phase II report. In the text and tables of the reports, the results were 1.3 mg/kg and 0.2 mg/kg, respectively. From the laboratory analytical reports, the actual results were 1300 mg/kg and 200 mg/kg, respectively. The TPH-d results without silica gel cleanup for those samples were 1400 mg/kg and 200 mg/kg, respectively.

The deeper soil samples (at 3') from borings P7-1, P7-4, P7-5, P7-6, P7-7, P7-10, and P7-11 were analyzed for TPH-d outside the standard hold time for the analysis, according to the laboratory reports.

HAZARDOUS MATERIAL STORAGE AREA

Petroleum impacts were found beneath the building floor in this area. The extent of those impacts should be investigated.

SAWMILL NO. 2

Excavation of soil around borings P7-3, P7-4, and P7-5 was recommended in the Phase II report. I concur with that recommendation.

Petroleum impacts were also detected in other borings in this grouping. The extent of those impacts should be investigated.

TP BURNER AND FUEL ASTs

Further investigation of the soils at boring P7-10 was recommended in the Phase II report. Further investigation of the impacts in this area is needed. Also, please provide a diagram relating the geophysical survey results in this area with the boring locations.

TRANSFORMERS

No comment.

SOUTH PONDS

The diesel tank, generator, and pump area next to the aeration pond was not sampled. That area should be investigated.

The possibility of past dumping of various wastes into the ponds and associated potential impacts needs to be evaluated.

SEDIMENT DRYING AREA

From the laboratory reports, soil sample P7-29@0.5' had a detection of 0.36 mg/kg fluoranthene, which was not noted in the Phase II report text or tables.

It appears from the Phase II report that an ash pile remains in this area. The disposal or long-term disposition of this material needs to be addressed.

EXISTING GROUNDWATER WELLS

Abandoning these wells was recommended in the Phase II report. I concur with properly decommissioning these wells.

STOCKPILE

Proper disposal or onsite treatment of this material was recommended in the Phase II report. I concur with the recommendation.

PARCEL 8

In some of the aerial photographs of the site, particularly the 1966 photographs in the Additional Assessment Report, one or two small structures are visible northeast of the southern end of the runway. While this is in the same area as the geophysical survey and pothole done at the southern end of the runway, these structures appear to have been farther east than where the survey and pothole were performed. The former location of these structures should be evaluated.

PARCEL 9

TREE NURSERY AREA

Some pesticides were detected in the groundwater in the nursery area. Further groundwater investigation was recommended in the Phase II report. The extent of the groundwater contamination should be investigated.

Our files contain a November 4, 1983 letter from Rex Timber Inc. (noted as "A subsidiary of Georgia-Pacific Corporation") listing the pesticides used at the time at the nursery and describing the use of a sump. The greenhouse sump was described as being a "10' x 10' x 10' " sump that took pesticide wastes. A map with the letter showed the sump was located inside the greenhouse directly east of the small building on the west side of the greenhouses. There was a discharge line from the building to the sump. Pesticide container rinsate was discharged to the sump. The practice was reportedly stopped in 1983. This sump could have been a route for pesticides to contaminate soil and groundwater without contaminating surface soil. Deeper investigation of the soils around the sump needs to be conducted.

The November 4, 1983 letter listed the following pesticides as being used at the nursery:

Fungicides -

Botran 75W
Benlate WP
Daconil 2787
Dithane M-45
Captan 50-WP
Truban
Banrot 40-WP

Insecticides -

Diazinon
Malathion

The Phase II report did not contain a comparison of the pesticides known to be used at the site and the pesticide analytical target list. Such a comparison needs to be made. It was stated in the Phase II report that the initial soil sample analyses performed did not follow the analysis plan that was stated to have been prepared (but was not included in the report). It was not stated if the follow-up groundwater sampling followed the plan. In addition, the analyses performed on the P9-17, P9-18, and P9-19 water samples did not appear to include each of the compounds found in the three soil samples with pesticide detections. A clear analysis plan needs to be prepared before additional sampling is performed.

SCRAP METAL AREA

I have no further comment on this area in addition to the general comments for the site.

TRANSFORMER

No comment.

PUBLIC COMMENTS

I have received comments that the Phase I assessment was insufficient and that additional former employees should be interviewed instead of just the few managers that were interviewed for the report.

I have received comments that the entire site should be geophysically surveyed in the same manner that the two additional areas were geophysically surveyed last August.

I have received comment that the dumping of wastes into shallow pits that were then paved over was a regular occurrence.

A former employee stated that the nursery had both open and closed (covered) storage. Open storage was on pallets with staining and evidence of spilling. Roundup and other agriculture chemicals were used. At one time, Georgia-Pacific personnel worked with UC Berkeley on experimenting with different agriculture chemicals in the field to kill pests and those chemicals

may have been stored at the nursery. The personnel office at the time had the MSDSs for those chemicals.

A former employee stated that some of the solvents used at the site were chlorinated.

A former employee stated that there was lots of spilling of solvents at the electrical shop.

A former employee stated that there could be high concentration point sources of contamination at the small sheds and that the site had been riddled with small sheds.

I have received comment that pentachlorophenol had been used on a regular basis in that past and that some waste pentachlorophenol had been dumped in the southern end of the site.

I have received comment that two capacitors were dumped into the log pond, potentially in an area of the pond that was subsequently filled.

I have received comment that various wastes were dumped in various ponds on the site.

I have received comment that metal (e.g. cars, machines, pipes) and solvents were dumped in the marsh area north of the nursery area on the east side of the site.

I have received comment that some dump spots had drains to the ocean.

I have received comments that there was regular dumping of hydraulic oils around the Cat shop.

I have received comment that on July 4, 1977, the site took around 25-35 truckloads of contaminated oil from Martinez to burn in the incinerators. It was said that that was not the only occurrence; it was done regularly on a smaller scale.

It has been said that there is a lagoon near the residential area at the south end of the site that received solvent dumping.

I have received comment that there is a pit or pits in the bottom of the powerhouse that received oils.

I have received comment that various wastes were put through the hog and were subsequently burned in the powerhouse.

The above public comments should be considered and addressed when preparing workplans for further investigative work at the site.